

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TRUE RETURN SYSTEMS LLC,

Plaintiff,

v.

MAKERDAO,

Defendant.

Case No. 1-22-cv-8478-VSB-JLC

**DECLARATION OF DAVID A. BOAG IN SUPPORT OF
PLAINTIFF’S EX PARTE MOTION FOR LEAVE TO SERVE
DEFENDANT MAKERDAO BY ELECTRONIC MEANS**

I, David A. Boag, declare as follows:

1. I am over the age of 18 and a member in good standing of the State Bar of New York and certified to practice before this Court. I am the principal of Boag Law, PLLC, counsel of record for plaintiff True Return Systems, LLC (“TRS” or “Plaintiff”).

2. I make this declaration based upon personal knowledge, and I could and would competently testify to the facts stated herein if called to do so.

3. I attest that the attached Exhibits in Support of Plaintiff’s Ex Parte Motion for Leave to Serve Defendant MakerDAO by Electronic Means are true and correct.

4. Exhibit A is a true and correct copy of a screen printout from <https://makerdao.world/en/learn/MakerDAO>, which was retrieved on November 9, 2022.

5. Exhibit B is a true and correct copy of a screen printout from <https://makerdao.world/en/learn/governance/mkr-token>, which was retrieved on November 9, 2022.

6. Exhibit C is a true and correct copy of a screen printout from <https://vote.makerdao.com/polling/QmbMaQ9A#vote-breakdown>, which was retrieved on November 9, 2022.

7. Exhibit D is a true and correct copy of a screen printout from <https://twitter.com/MakerDAO>, which was retrieved on November 9, 2022.

8. Exhibit E is a true and correct copy of a partial screen printout from <https://twitter.com/MakerDAO/status/1578391162741727232>, which was retrieved on November 10, 2022.

9. Exhibit F is a true and correct copy of a screen printout from <https://twitter.com/MakerDAO/status/1044210095159169024>, which was retrieved on November 9, 2022.

10. On October 12, 2022, I posted a link to the Summons, the Complaint with exhibits, and a letter requesting waiver of service to the MakerDAO Forum at forum.makerdao.com. A true and correct copy of a screen printout of this post is attached as Exhibit G. The link to the documents has remained live since the October 12, 2022, posting.

11. The forum.makerdao.com website states that the post shown in Exhibit G has been viewed more than 225 times as of this Declaration.

12. Exhibit H is a true and correct copy of message that I sent to @MakerDAO via direct message on Twitter on October 12, 2022.

13. Exhibit I is a true and correct copy of an email message that I sent to support@makerdao.com on October 12, 2022.

14. Exhibit J is a true and correct copy of a screen printout from <https://forum.makerdao.com/t/infringement-complaint-filed-against-makerdao/18337>, which was retrieved on November 9, 2022.

15. Exhibit K is a true and correct copy of a screen printout from <https://forum.makerdao.com/t/real-world-finance-core-unit-report-2021-08/10123>, which was retrieved on November 9, 2022.

16. Exhibit L is a true and correct copy of a screen printout from <https://forum.makerdao.com/t/a16z-makerdao-tokenomics-proposal-three-increasing-financial-resiliency-and-fostering-growth/14138/5>, which was retrieved on November 10, 2022.

17. Exhibit M is a true and correct copy of a partial screen printout from <https://forum.makerdao.com/t/acreinvest-delegate-platform/11943/71>, which was retrieved on November 9, 2022.

18. Exhibit N is a true and correct copy of a screen printout from <https://blog.makerdao.com/makerdao-has-come-full-circle>, which was retrieved on November 10, 2022.

19. Exhibit O is a true and correct copy of a partial screen printout from <https://twitter.com/MakerDAO/status/1587834392579395585>, which was retrieved on November 10, 2022.

20. Exhibit P is a true and correct copy of a screen printout from <https://cryptonews.com/news/makerdao-move-16-billion-usdc-into-coinbase-custody-heres-what-you-need-know.htm>, which was retrieved on November 11, 2022.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 11th day of November 2022.



David A. Boag